

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>07-542</u>
v.	:	DATE FILED: <u>9/11/07</u>
JOSE MANUEL ARANGO, a/k/a "Colombia"	:	VIOLATIONS:
	:	21 U.S.C. § 841(a)(1) (possession with
	:	intent to distribute 1 kilogram or more of
	:	heroin - 1 count)
	:	21 U.S.C. § 860(a) (possession with intent
	:	to distribute 1 kilogram or more of
	:	heroin within 1000 feet of a school -
	:	1 count)
	:	18 U.S.C. § 924(c) (possession of a firearm
	:	in furtherance of a drug trafficking
	:	crime - 1 count)
	:	18 U.S.C. § 922(g)(1) (possession of a
	:	firearm by a convicted felon - 1 count)
		Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about August 1, 2007, in Reading, in the Eastern District of Pennsylvania,
defendant

JOSE MANUEL ARANGO,
a/k/a "Colombia,"

knowingly and intentionally possessed with intent to distribute 1 kilogram or more, that is,
approximately 3 kilograms, of a mixture and substance containing a detectable amount of heroin,
a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 1, 2007, in Reading, in the Eastern District of Pennsylvania,
defendant

**JOSE MANUEL ARANGO,
a/k/a "Colombia,"**

knowingly and intentionally possessed with intent to distribute 1 kilogram or more, that is,
approximately 3 kilograms, of a mixture and substance containing a detectable amount of heroin,
a Schedule I controlled substance, within 1000 feet of the real property comprising the 10th and
Green Elementary School, a public elementary school, located at 10th and Green Streets,
Reading, Pennsylvania and the 13th and Green Elementary School, a public elementary school,
located at 13th and Green Streets, Reading, Pennsylvania, in violation of Title 21, United States
Code, Section 841(a)(1), (b)(1)(A).

_____ In violation of Title 21, United States Code, Section 860(a).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 1, 2007, in Reading, in the Eastern District of Pennsylvania,
defendant

**JOSE MANUEL ARANGO,
a/k/a "Colombia,"**

knowingly possessed a firearm, that is, a Glock, Model 22, .40 caliber handgun, serial number AKS933, loaded with 10 live rounds of .40 caliber ammunition, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute heroin, in violation of Title 21, United States Code, Section 841(a)(1), and possession with intent to distribute heroin within 1000 feet of an elementary school, in violation of Title 21, United States Code, Section 860(a).

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 1, 2007, in Reading, in the Eastern District of Pennsylvania,
defendant

**JOSE MANUEL ARANGO,
a/k/a "Colombia,"**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce, a firearm, that is, a Glock, Model 22, .40 caliber handgun, serial number AKS933, loaded with 10 live rounds of .40 caliber ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE

1. As a result of the violations of Title 21, United States Code, Sections 841(a)(1) and 860(a), and Title 18, United States Code, Sections 924(c) and 922(g)(1) set forth in this indictment, defendant

**JOSE MANUEL ARANGO,
a/k/a "Colombia,"**

shall forfeit to the United States of America

- (a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses, including but not limited to the white 2000 Buick Regal sedan, VIN # 2G4WF5512Y1190659, bearing PA registration GSE-2720, the loaded Glock, Model 22, .40 caliber handgun, serial number, AKS933; and
- (b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offense.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty.

it is the intent of the United States, to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853, Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d). _____

_____ **A TRUE BILL:**

FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY _____